## UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	No. 1:19-cr-00251-LM
v.	
JOHNATHON IRISH,	
Defendant.	

## ASSENTED-TO MOTION TO SEAL AT LEVEL I: UNREDACTED VERSION OF SUPPLEMENTAL SENTENCING MEMORANDUM AND EXHIBIT 2 TO THAT MEMORANDUM

The United States of America respectfully moves to seal at Level I an unreducted version of its Supplement to its Sentencing Memorandum and Exhibit 2 to that filing (ECF Nos. 91, 91-2). This United States does not seek to seal this motion.

Under Federal Rule of Criminal Procedure 49.1(d) and Local Rule 83.12, the Court has authority to grant this motion.

Sig Sauer, Inc. contracted with AO Precision Manufacturing LLC to manufacture firearms parts. Consistent with that contract, AO Precision Manufacturing LLC manufactured a lower receiver that was used to assemble one of the firearms the defendant purchased and possessed. The memorandum and Exhibit 2 reference the Blanket Purchase Agreement between Sig Sauer, Inc., and AO Precision Manufacturing LLC. The Court should seal the unredacted versions of these documents because they contain confidential pricing information and public disclosure of this information could adversely impact Sig Sauer, Inc. and AO Precision Manufacturing, Inc.

Counsel for the defendant assents to this motion.

Dated: February 23, 2021 Respectfully submitted,

SCOTT W. MURRAY United States Attorney

By: /s/ Anna Z. Krasinski

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## **CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed on February 23, 2021 with a copy provided via electronic mail to Attorney Richard Guerriero, counsel of record at <a href="mailto:richard@nhdefender.com">richard@nhdefender.com</a>.

/s/ Anna Z. Krasinski Anna Z. Krasinski Assistant United States Attorney